


Exhibit “C”

From: GARY LIGHTMAN garylighman@lightmanlaw.com 
Subject: Fwd: AMERICAN ENVIRONMENTAL ENTERPRISES INC., D/B/A THESAFETYHOUSE.COM v. MANFRED STERNBERG, et al
Date: April 15, 2024 at 8:54 PM
To: Pat Healey phealey@rebarkelly.com
Cc: Kim DiTomaso kditomaso@lightmanlaw.com, Glenn Manochi gmanochi@lightmanlaw.com, GARY LIGHTMAN ltag8r@me.com

G

Patrick,

To say that we were “underwhelmed” by the attached “Revised Answers and Objections” of the Zekaria Defendants to plaintiff’s Interrogatories and Document Requests propounded upon the Zekaria Defendants, that you produced earlier today in your 4/15 email to us, would be a gross understatement.

THE ZEKARIA DEFENDANTS HAVE FAILED AND REFUSED TO COMPLY WITH JUDGE YOUNGE’S 4/1/24 ORDER COMPELLING "FULL AND COMPLETE VERIFIED ANSWERS (WITHOUT OBJECTION)" TO PLAINTIFF’S DISCOVERY REQUESTS, AND THE PRODUCTION OF ALL RESPONSIVE DOCUMENTS.

We are attaching to this email, a list of the Deficiencies of the Zekaria Defendants in that regard.

For example—Where are the emails to or from Daphna, and the Weiss Defendants, and/or the Gross Defendants, and/or Manfred Sternberg? None have been produced by Daphna (although other defendants have produced some of those responsive documents).

For example—Where are the text messages (other than the one string of WhatsApp messages)? None have been produced by Daphna (although other defendants have produced some of those responsive documents).

Please advise us (by no later than Wednesday 4/17) whether your clients will be sending us “full and complete answers (without objection)” to the plaintiff’s discovery requests, and all responsive documents, in compliance with Judge Younge’s 4/1/24 Order compelling discovery (and if so, a date certain by which we will get that required discover material from your clients), or whether we should just file our Motion for Contempt and for Sanctions.

thx
Gary Lightman
cell 215-760-3000

attachment

cc: client

KDT—pls DAs (discovery—prod by Zekaria 041524 folder)
also dy to f/u on Thurs 4/18 tg



DEFICIENCIES.Z
ekaria....24.pdf

Begin forwarded message:

From: Patrick Healey <phealey@rebarkelly.com>
Subject: AMERICAN ENVIRONMENTAL ENTERPRISES INC., D/B/A THESAFETYHOUSE.COM

v. MANFRED STERNBERG, et al

Date: April 15, 2024 at 9:02:30 AM EDT

To: Gary Lightman <garyl@lightmanlaw.com>, "Laver, Seth L." <slaver@goldbergsegalla.com>

Cc: Gary Weiss <wgary4109@gmail.com>, 'Sam Gross' <Samrosinc@icloud.com>, Cathleen Kelly Rebar <crebar@rebarkelly.com>, Kathy Ciesielka <kciesielka@rebarkelly.com>, Michael Rebar <mrebar@rebarkelly.com>, "Patrick Healey" <phealey@rebarkelly.com>

Counselors:

Please see the attached documents. Please let us know if you have any questions. Thank you.

Pat Healey



Patrick J. Healey
Partner

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614.245.2141 | eFax: 888.761.8299

We are pleased to announce that our New York office has relocated, and therefore our address has changed.

Please note, our New York office address is now:

256 West 36th Street
Suite 900
New York, NY 10018



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